

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

UNITED STATES OF AMERICA

v.

CHRISTOPHER ALEXANDER (01)

No. 4:23-MJ-494

U.S. DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FILED

JUN 28 2023

CLERK, U.S. DISTRICT COURT

Bj, Deputy

CRIMINAL COMPLAINT

Conspiracy to Possess a Controlled Substance with Intent to Distribute
(Violation of 21 U.S.C. § 846)

Beginning in or before March 2023 and continuing until in and around May 2023, in the Fort Worth Division of the Northern District of Texas, and elsewhere, defendant **Christopher Alexander**, along with others unknown, did knowingly and intentionally combine, conspire, confederate, and agree to engage in conduct in violation of 21 U.S.C. §§ 841(a)(1) & (b)(1)(A), namely to possess with intent to distribute 50 grams or more of methamphetamine, a schedule II controlled substance.

In violation of 21 U.S.C. § 846 (21 U.S.C. §§ 841(a)(1) & (b)(1)(A))

I. INTRODUCTION

1. I have been a Special Agent of the Federal Bureau of Investigation (FBI) for four years and am currently assigned to the Dallas Field Division's Fort Worth Resident Agency on a Criminal Enterprise Squad working with a Violent Crime/Gang Task Force (hereinafter referred to as the Task Force). The Task Force is comprised of agents, investigators and police officers from the FBI and the Fort Worth, Texas Police Department (FWPD). As a Special Agent, I am charged with the duties of investigating violations of the criminal laws of the United States, including investigating violations of 21 U.S.C. § 846.

2. I have participated as a law enforcement officer in investigations of unlawful narcotics distribution and have conducted Title III wiretap investigations, physical and electronic surveillances, undercover transactions, the execution of search and arrest warrants, debriefings of informants, and review of taped conversations and drug records.

3. Through my training, education and experience, I have become familiar with the manner in which illegal drugs are transported, stored and distributed, and the methods of payments for such drugs. I am also familiar with some of the methods by which narcotics traffickers communicate and code words commonly used by narcotics traffickers. I have participated as a law enforcement officer in investigations of money laundering. Through my training, education and experience, I have become familiar with the manners in which individuals promote or conduct specified unlawful activities and conceal or disguise the nature, source, ownership, and control of proceeds of specified unlawful activities.

4. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents, law enforcement officers, and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for a criminal complaint and does not set forth all of my knowledge about this matter. All calls referenced in the complaint are summaries of the intercepted call and are not intended to be a verbatim translation of the call.

5. This affidavit is submitted in support of a criminal complaint against **Christopher Alexander** for a violation of 21 U.S.C. § 846, Conspiracy to Possess with Intent to Distribute and Distribute a Schedule II Controlled Substance, namely methamphetamine.

6. FBI Investigators are currently investigating Alexander, based in Fort Worth, Texas, involved in the trafficking and distribution of methamphetamine (Ice), Fentanyl, and other illegal substances.

7. Alexander has been identified as a potential drug supplier since 2017. Specifically, in August and September of 2017, the Task Force began targeting various methamphetamine dealers in north Fort Worth, Texas area. One of the targets, Alexander, provided three drug samples, either directly or indirectly by utilizing CHS'.

8. A CHS has known Alexander for multiple years and has had direct access to him, dating back to 2017.

9. On March 4, 2023, CHS contacted Alexander, using xxx-xxx-4219 (hereinafter referred to as the Target Cell Phone), for the purpose of discussing illegal substance availability. Alexander disclosed that he sells methamphetamine and M-30 pills in the Fort Worth, Texas area.

10. On March 16, 2023, CHS met with Alexander to discuss further drug trafficking details and to assess Alexander's capabilities as a supplier. Agents utilized electronic surveillance to monitor the meeting between the CHS and Alexander.

11. Alexander informed CHS that he sells methamphetamine and M-30 pills. His source of supply is an unknown Hispanic male. Alexander disclosed that he is buying Fentanyl for \$4 to \$8 per pill and is selling them at around \$25 per pill. Alexander is selling methamphetamine for \$200 per ounce.

12. One of Alexander's regular buyers of M-30 pills is a white male who works as an air traffic controller at Dallas/Fort Worth Airport. Biweekly, the unknown white male purchases an undisclosed amount of Fentanyl for \$2,500.00.

13. Alexander verbalized his capabilities to sell any desired amount of methamphetamine and Fentanyl to the CHS.

14. In addition to being actively involved in drug trafficking of methamphetamine and M-30 pills, Alexander informed CHS that he has five to ten females working for him as prostitutes.

15. On March 14, 2023, Verizon was served with an Administrative Subpoena, requesting subscriber information for the Target Cell Phone. On March 21, 2023, Verizon provided subscriber information that resolved the Target Cell Phone to Alexander and address 7008 San Luis Trail, Fort Worth, Texas (hereinafter referred to as the Residence).

16. On March 22, 2023, a United States Magistrate Judge for the Northern District of Texas, entered an order authorizing the installation and use of pen register of the Target Cell Phone.

17. On March 31, 2023, a United Stats Magistrate Judge for the Northern District of Texas, entered an order authorizing the installation and use of Ping/GPS to ascertain the physical location of the Target Cell Phone.

18. Prior to March 24, 2023, a CHS contacted Alexander to discuss a potential purchase of methamphetamine and M-30 pills. Alexander agreed to sell one ounce of methamphetamine for \$200 and one hundred M-30 pills for \$600. Boomer Jack's Grill & Bar, 6701 Fossil Bluff Drive, Fort Worth, Texas was the agreed location for the controlled purchase.

19. On March 24, 2023, physical surveillance was initiated in and around the vicinity of Boomer Jack's Bar & Grill and the Residence. A silver van, bearing Texas license plates BDZ0664 and white Jeep Cherokee, bearing Texas license plate ACE2014, registered to Alexander (hereinafter referred to as Target Vehicle), were parked in the driveway of the Residence.

20. On March 24, 2023, at approximately 1:00 p.m., CHS met with SAs Tim Smylie and Pance Kecev at a pre-determined location. SA Smylie equipped the CHS with electronic surveillance equipment and provided the purchase funds. At around 1:57 p.m., CHS arrived at Boomer Jack's Grill & Bar.

21. At approximately 3:41 p.m., the garage door of the Residence opened, and Alexander moved the white Jeep ACE2014 from the driveway and parked it on the street in front of the Residence. He then entered the garage, backed out a black Ford Escape SUV, bearing Texas license plate KNV1396. Alexander briefly re-entered the Residence. Shortly thereafter, Alexander departed the Residence exiting the neighborhood at the east gate onto the I-35 access road.

22. At around 3:45 p.m., Alexander, using the Target Cell Phone, called CHS and instructed the CHS to depart Boomer Jack's Grill & Bar and meet at another location. Immediately after the call, CHS and Alexander met at a small strip shopping mall, at the corner of Hartnett Way and Sandshell Boulevard in Fort Worth, Texas.

23. CHS took possession of approximately one ounce of suspected methamphetamine and one hundred M-30 pills, suspected to be Fentanyl.

24. At approximately 3:55 p.m. Special Agents Smylie and Kecev, retrieved the suspected drug evidence. A field test of the white crystalline substance, conducted by SA Smylie, indicated a positive presence of methamphetamine.

25. Drug Enforcement Agency (hereinafter referred to as DEA) laboratory test of the March 24, 2023 seized substances indicated the net weight of the methamphetamine was 25.83 grams with 100% purity, and the net weight of the pills was 11.076 grams containing 4-Anilino-N-phenethylpiperidine and fentanyl.

26. Prior to April 13, 2023, a CHS contacted Alexander to discuss a second purchase of methamphetamine and M-30 pills. Alexander again agreed to sell one ounce of methamphetamine for \$200 and one hundred M-30 pills for \$600. Boomer Jack's Grill & Bar, 6701 Fossil Bluff Drive, Fort Worth, Texas was the agreed location for the controlled purchase.

27. On April 13, 2023, CHS met with SAs Tim Smylie and Patrick McGuire at a pre-determined location. SA Smylie equipped the CHS with electronic surveillance equipment and provided the purchase funds.

28. At approximately 4:05 p.m., CHS met with Alexander at a small strip shopping mall, at the corner of Hartnett Way and Sandshell Boulevard in Fort Worth, Texas and took possession of approximately one ounce of suspected methamphetamine and one hundred M-30 pills, suspected to be Fentanyl.

29. A field test of the white crystalline substance indicated a positive presence of methamphetamine.

30. Drug Enforcement Agency (hereinafter referred to as DEA) laboratory test of the April 13, 2023 seized substances indicated the net weight of the methamphetamine was 27.53 grams with 83% purity, and the net weight of the pills was 10.579 grams containing 4-Anilino-N-phenethylpiperidine and fentanyl.

31. Prior to April 28, 2023, a CHS contacted Alexander via the Target Cell Phone to discuss a third purchase of methamphetamine and M-30 pills. Alexander again agreed to sell one ounce of methamphetamine for \$200 and one hundred M-30 pills for \$600.

32. On April 28, 2023, at around 9:30 a.m., the Target Vehicle was parked on Holiday Lane adjacent to North Ridge Elementary Scholl, North Richland Hills, Texas. At 9:47 a.m., Alexander, wearing a dark baseball hat backwards, a navy-blue T-shirt with design on front, gray shorts, and white tennis shoes, was seeing assisting with a school field day at North Ridge Elementary School. At around 10:43 a.m., Alexander walked to the Target Vehicle, entered on the driver's side, and departed. At 10:58 a.m., Alexander briefly stopped at the Valero Gas Station, 5401 Watauga Road, Fort Worth, Texas. At 11:07 a.m., Alexander entered the neighborhood gate. At 11:09 a.m., the Target Vehicle was parked in front of the Residence.

33. At around 11:32 a.m., Alexander, driving the Target Vehicle departed the neighborhood. He was observed driving south on I-35 access road, west on Western Center Boulevard, Fort Worth, Texas, and parking at the Western Center Market Place, 2730 Western Center Boulevards, Fort Worth, Texas. Alexander briefly talked to an unidentified male, operating a gray Mazda, bearing Texas license plates ZS39PKF.

34. On April 28, 2023, CHS met with SAs Tim Smylie and Pance Kecev at a pre-determined location. SA Smylie equipped the CHS with electronic surveillance equipment and provided the purchase funds.

35. On April 28, 2023, at approximately 11:38 a.m. CHS met with Alexander and took possession of one ounce of methamphetamine and one hundred M-30 pills, suspected to be Fentanyl. Immediately after the transaction, Alexander departed.

36. At 11:44 a.m., Alexander met again with the CHS at the BriteZone Express Car Wash, 2870 Western Center Boulevard, Fort Worth, Texas.

37. At approximately 11:56 a.m., the Target Vehicle was parked at the Residence.

38. A field test of the white crystalline substance seized on April 28, 2023, indicated a positive presence of methamphetamine.

39. Drug Enforcement Agency (hereinafter referred to as DEA) laboratory test of the April 28, 2023, seized substances indicated the net weight of the methamphetamine was 27.7 grams with 100% purity, and the net weight of the pills was 10.17 grams containing fentanyl.

40. Prior to May 5, 2023, a CHS contacted Alexander via the Target Cell Phone to discuss a fourth purchase of methamphetamine and M-30 pills. Alexander agreed to sell two ounces of methamphetamine for \$400 and one hundred M-30 pills for \$600.

41. On May 5, 2023, at approximately 11:00 a.m., CHS met with SAs Patrick McGuire and Pance Kecev at a pre-determined location. SA Smylie equipped the CHS with electronic surveillance equipment and provided the purchase funds.

42. On May 5, 2023, at approximately 1:40 p.m. CHS met with Alexander and took possession of two ounces of methamphetamine and one hundred M-30 pills, suspected to be Fentanyl.

43. A field test of the white crystalline substance indicated a positive presence of methamphetamine.

44. On March 12, 2023, a United Stats Magistrate Judge for the Northern District of Texas, entered a renewal order authorizing the installation and use of Ping/GPS to ascertain the physical location of the Target Cell Phone.

45. Prior to May 18, 2023, a CHS contacted Alexander via the Target Cell Phone to discuss a fourth purchase of methamphetamine and M-30 pills. Alexander agreed to sell two ounces of methamphetamine for \$400 and one hundred M-30 pills for \$600.

46. On May 18, CHS attempted to contact Alexander multiple times via the Target Cell Phone. Alexander did not respond until late afternoon. Alexander informed the CHS that the transaction will take place on May 19, 2023, or they will no longer schedule any future purchases.

47. The controlled purchase was rescheduled to May 19, 2023, at 2:00 p.m.

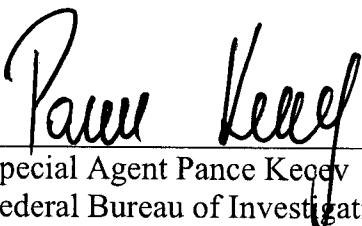
48. On May 19, 2023, at approximately 1:00 p.m., CHS met with SAs Tim Smylie and Pance Kecev at a pre-determined location. SA Smylie equipped the CHS with electronic surveillance equipment and provided the purchase funds.

49. On May 19, 2023, at approximately 1:04 p.m., the Target Vehicle and a silver van, bearing Texas license plate BDZ0664, were parked in the driveway of the Residence. At around 2:02 p.m., the target Vehicle departed the Residence exiting the neighborhood gate on Los Osos Drive, Fort Worth, Texas. Physical surveillance observed the vehicle traveling south on I-35 service road and then west on Western Center Boulevard.

50. On May 19, 2023, at approximately 2:05 p.m. CHS met with Alexander at the parking lot of Western Center Market, 2730 Western Center Boulevard, Fort Worth, Texas, and took possession of three ounces of methamphetamine and one hundred M-30 pills, suspected to be Fentanyl.

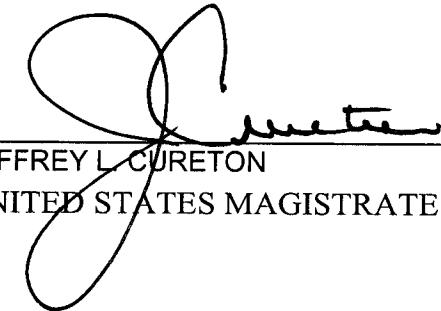
51. At around 2:06 p.m., the Target Vehicle departed the meet location, headed east on Western Center Boulevard, and immediately parked at Chick-fil-A, 2900 Western Center Boulevard, Fort Worth, Texas. Physical surveillance observed Alexander walking into the Chick-fil-A. At 2:14 p.m., the Target vehicle was headed east on Western Center Boulevard. Physical surveillance maintained visual control of the Target Vehicle. At approximately 2:22 p.m., the Target Vehicle arrived the Residence.

57. Although your AFFIANT has not listed all the facts regarding the investigation into **Christopher Alexander**, your AFFIANT believes the facts stated here establish probable cause that **Christopher Alexander** did knowingly and intentionally combine, conspire, confederate, and agree to engage in conduct in violation of 21 U.S.C. § 846 (21 U.S.C. §§ 841(a)(1) and (b)(1)(A)), namely to conspire to possess with intent to distribute 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.



Special Agent Pance Kecev
Federal Bureau of Investigation

Sworn and Subscribed before me on this 28th day of June 2023, at _____
1:27 a.m., in Fort Worth, Texas.



JEFFREY L. CURETON
UNITED STATES MAGISTRATE JUDGE